

STONE MAGNANINI

COMPLEX LITIGATION

August 8, 2022

VIA ELECTRONIC FILING

Hon. Michael A. Hammer, U.S.D.J.
United States District Court
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

Re: *United States v. Jobadiah Sinclair Weeks*
Docket No. 19-CR-877 (CCC)

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Jobadiah Sinclair Weeks. We respectfully move to modify Mr. Weeks' bail conditions from home incarceration to a curfew, to allow Mr. Weeks to attend family activities and visit family-owned properties within the State of Colorado.

Specifically, the activities in question include, but are not limited to, the following:

- Family events including, but not limited to, Mr. Weeks' daughter's ballet recitals, soccer games, gymnastic competitions, and trips with his family to a nearby park;
- Family gatherings, including, but not limited to, weddings, family reunions and funerals;
- Religious events and services including, but not limited to, weekend church services and weekly bible study sessions; and
- Visits to family-owned business and properties within the State of Colorado, including, but not limited to, Mr. Weeks' parents' cabin in Buena Vista, Colorado and their home in Arvada, Colorado.

Mr. Weeks will be accompanied by one or more of the third-party custodians included in the November 6, 2020 Order setting the initial conditions of Mr. Weeks' release—Nathaniel Weeks, Silence Weeks, and Stephanie Weeks. In addition, those same activities must first be approved by Pretrial Services before Mr. Weeks' is permitted to attend them. To the extent Mr. Weeks wishes to engage in activities outside of Colorado, apart from those pre-approved activities delineated in the November 6, 2020 Order, he must submit a separate order for review and approval from Pretrial Services and the United States prior to submission to the Court.

Pretrial Services Officer has informed us that they are amenable to this modification in light of Mr. Weeks' overall compliance with the conditions of his release. The United States, through Assistant United States Attorney Anthony Torntore, defers to Pretrial Service's position.

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Page 2

We thank Your Honor for your courtesy in this matter,

Respectfully submitted,

/s/ David S. Stone

David S. Stone, Esq.

Managing Partner

cc: Government Counsel of Record (via ECF and e-mail)
U.S. Pretrial Services Officer David Hernandez (via e-mail)